

United States Courts
Southern District of Texas
FILED

May 14, 2025

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA

V.

JEREMY DAVIS,
Defendant

§
§
§
§
§
§

CRIMINAL NO.: **4:25-cr-00246**

INDICTMENT

THE GRAND JURY CHARGES THAT:

INTRODUCTION

At all times material to this Indictment, T-MOBILE, is a St. Bellevue, Washington, based company, with stores throughout the United States, engaged in the business of retail purchase and sales of consumer goods which are shipped in interstate commerce and which affect interstate commerce.

COUNT ONE

**Title 18, United States Code, §§ 1951(a) and 2-Aiding and Abetting Interference with Commerce
by Robbery**

On or about January 26, 2025, in the Houston Division of the Southern District of Texas,

JEREMY DAVIS

defendant herein, aiding and abetting others known and unknown to the Grand Jury, did unlawfully obstruct, delay, and affect interstate commerce and the movement of articles and commodities in commerce by means of robbery, as the terms “commerce” and “robbery” are defined in Title 18, United States Code, §§ 1951(b)(1) and (b)(3), in that the defendant did unlawfully take and obtain the property of T-MOBILE, located at 8205 Cullen, Houston, Texas,

which was in the possession and custody of an employee of T-MOBILE, namely, United States currency, by means of actual and threatened force, violence, and fear of injury to those in lawful possession of those items.

In violation of Title 18, United States Code, §§ 1951(a) and 2.

COUNT TWO

Title 18, United States Code, §§ 924(c)(1)(A)(iii) and 2: -
Aiding and Abetting Discharging of a Firearm During and in Relation to a Crime of Violence

On or about January 26, 2025, in the Houston Division of the Southern District of Texas,

JEREMY DAVIS,

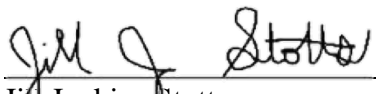
defendant herein, aiding and abetting others known and unknown to the Grand Jury did knowingly discharge a firearm, namely, a handgun, during and in relationship to a crime of violence for which they may be prosecuted in a court of the United States, that being Aiding and Abetting Interference with Commerce by Robbery, as alleged in Count One.

In violation of Title 18, United States Code, §§ 924(c)(1)(A)(iii) and 2.

A TRUE BILL:

Original Signature on File
FOREMAN OF THE GRAND JURY

NICHOLAS J. GANJEI
United States Attorney

BY: 
Jill Jenkins Stotts
Assistant United States Attorney